

**IN THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(Northern Division)**

JANE DOE,

*

Plaintiff,

*

v.

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Civil Action No. WMN-14-3906

MARYLAND DEPARTMENT OF HEALTH
AND MENTAL HYGIENE, et al.,

*

*

Defendants.

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JOINT MOTION FOR ADDITIONAL 60-DAY STAY OF SCHEDULING ORDER

Plaintiff Jane Doe and Defendants, the Maryland Department of Health and Mental Hygiene (“DHMH”), et al., by their undersigned attorneys, respectfully move this Honorable Court to enter an order continuing its stay of its Scheduling Order in this case, including the deadline for seeking modification of the Scheduling Order, for an additional period of sixty (60) days from the expiration date of the current stay (March 7, 2015), for the following reasons.

1. This case involves Maryland Tort Claims Act and 42 USC §§ 1983 and 1988 claims by Plaintiff against DHMH and several current and former officials of DHMH concerning alleged sexual assaults of Plaintiff when she was in State facilities operated by DHMH, by other patients at those facilities. Defendants have filed an Answer denying the claims and allegations.

2. This Court previously granted the parties’ Joint Motion for Stay of Scheduling Order, staying the proceedings through March 7, 2015. That stay was entered to give the parties an opportunity to pursue a possible settlement of their disputes.

3. The parties have had productive discussions and are continuing to discuss issues concerning settlement of their disputes and possible systemic reforms. Both sides agree that

extending the stay for another sixty day period to allow those discussions to continue is in the best interests of all parties.

3. A further sixty-day stay of the proceedings will permit the parties to focus on the substance of the disputes, potentially avoiding the time and expense of preparing and responding to a motion to dismiss and discovery.

4. These facts constitute good cause to delay the Court's Scheduling Order for another sixty days, from the current deadline of March 7, 2015, to a new deadline of May 6, 2015.

WHEREFORE, the parties respectfully request that the Court enter the accompanying proposed Order staying the Scheduling Order, including its deadline for seeking modifications.

Respectfully submitted,

/s/

Mitchell Y. Mirviss (Fed. Bar No. 05535)
Stephen E. Marshall (Fed. Bar No. 08896)
Michael L. Hecht (Fed. Bar No. 26174)
Venable LLP
750 E. Pratt St. Suite 900
Baltimore, MD 21202
(410) 244-7400
(410) 244-7742 (fax)
mymirviss@venable.com
semarshall@venable.com
mlhecht@venable.com

/s/

Lauren Young (Fed. Bar No. 14364)
Lauren Cain (Fed. Bar No. 25882)
Maryland Disability Law Center
1500 Union Ave., Suite 2000
Baltimore, MD 21211
(410) 727-6352
(410) 727-6389 (fax)
laureny@mdlclaw.org
laurac@mdlclaw.org

Attorneys for Plaintiff

DOUGLAS F. GANSLER
Attorney General of Maryland

/s/

Kathleen A. Morse (Fed. Bar No. 06203)
Assistant Attorney General

Francesca Gibbs (Fed. Bar No. 29729)
Assistant Attorney General

Maryland Attorney General's Office
300 West Preston St., Suite 301
Baltimore, MD 21201

(410) 767-1866 (Ms. Morse)

(410) 767-1875 (Ms. Gibbs)

(410) 333-7467 (fax)

kathleen.morse@maryland.gov

francesca.gibbs@maryland.gov

Attorneys for Defendants